

# **Bridewell Leadership Statement on Modern Slavery**

#### **Document Control**

Reference:	BMS-FWK-016
Issue:	1.0 LIVE
Issue Date	09/01/2025
Classification:	No Marking
Author:	Security & Compliance
Owner	BMS Lead
Approval:	BMS Executive Sponsor

Version History		
1.0	LIVE	Published

# **Bridewell**

## 1. Overview

#### 1.1. Introduction from Bridewell's CEO, Anthony Young

Bridewell has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships, as well as to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

This statement highlights the key activities we have undertaken during this financial year to combat modern slavery in our organisation and supply chain.

We are committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all our contractors, suppliers, and other business partners. We pride ourselves highly on promoting human rights within the business and ensuring all employee's wellbeing is a priority. Our People Team take responsibility for employee wellbeing in the workplace and our staff operate with integrity to ensure all our business policies and practices are ethically based.

#### 1.2. Purpose

This document provides Bridewell's commitment to implementing the requirements of the Modern Slavery Act 2015.

To support this commitment, Bridewell has implemented a series of internal policies and processes that ensure we do not utilise modern slavery in our organisation or supply chain and raises awareness of the issue of modern slavery within our workforce.

#### 1.3. Scope

This statement applies to all Bridewell Group activities, including our supply chain.

# 2. Statement

#### 2.1. Organisation's Structure

Bridewell is a Cyber Security Services firm that has a strong track record for delivering complex security and privacy projects. This includes the management of delivery and excellent customer service, assisting our clients by providing a full range of security services across Cyber Security, Managed Security Services, Penetration Testing and Data Privacy.

Bridewell Group Holdings Limited is the parent company of the Bridewell group of companies (the "Group"). The Group has over 300 employees worldwide and operates in the UK and the USA, and we believe that the risk of human trafficking in our workforce is **low**.

The Group has a global annual turnover in excess of £40,000,000 for the year ending 31 December 2024.



#### 2.2. Our Supply Chains

Bridewell predominantly uses professionally qualified individuals employed directly by the Group to deliver services to clients and our policies ensure the fair treatment of contractors worldwide.

Our supply chains predominantly include software providers for internal systems for areas such as finance and HR. We utilise globally recognised software/IT providers to support the provision of services to clients and independent contractors to provide specific skills to clients.

## 2.3. Our Policies on Slavery and Human Trafficking

We have appropriate policies in place that underpin our commitment to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies in line with relevant industry certification management systems.

Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships, as well as for implementing and enforcing effective systems and controls to ensure slavery, and human trafficking are not taking place anywhere in our supply chains.

Our values of 'One Team', 'Do the right thing', and 'Above and Beyond' underpin Bridewell's culture. They outline the expectations of our people's behaviour with colleagues, clients, and wider stakeholders.

We seek to treat everyone fairly and consistently by creating a transparent and collaborative working environment.

We also have the following policies in place relevant to modern slavery, which we continuously review and update:

- Code of ethics and behaviours.
- Anti-Bribery and Corruption policy.
- An external process for handling complaints.
- Employment policies that protect our employees from unfair treatment and create a positive and inclusive workplace.
- A robust recruitment process and pay review process.
- Commitment to the living wage.
- Wellbeing initiatives to support our team's physical and mental health.
- Due diligence processes for slavery and human trafficking.

We understand that the following areas give rise to the highest modern slavery risks:

- the use of third-party contractors
- recruitment of overseas workers

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As part of our initiative to identify and mitigate risk, we complete right-to-work checks and use best-in-class suppliers to provide software and services. Our due diligence processes also include reviews of adherence to the Modern Slavery Act.

#### 2.4. Supplier Adherence to our Values and Ethics

We have zero tolerance to slavery and human trafficking. We have a supply chain compliance programme in place to ensure that all those in our supply chain and contractors comply with our values and ethics. This consists of a series of reviews and assessments conducted by our staff to identify any suppliers who could potentially pose a modern slavery or human trafficking risk. If a supplier is identified as potentially posing a risk, they are questioned on their compliance with the Modern Slavery Act 2015 and asked to demonstrate their commitment to preventing modern slavery and human trafficking.

If a supplier is identified as utilising modern slavery or human trafficking either through opensource reporting or whistleblowing, we will review our business arrangement with this supplier, with the presumption being that we will terminate any relationship with that supplier.

#### 2.5. Training

To ensure a high level of understanding of the risks for modern slavery and human trafficking in our supply chains and our business, we provide training to our staff on the impact of modern slavery and the identification and reporting requirements for modern slavery.

### 2.6. Our Effectiveness in Combating Slavery and Human Trafficking

We log complaints received from employees or external parties and actions taken. To the date of this statement, Bridewell has had no identified instances of modern slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 2025. It was approved by the board on 3 February 2025.

Ruth Billen, CFO

Bull

On behalf of Bridewell Group Holdings Limited

Date: 12 March 2025



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